1 2 3 4 5 6 7	NOSSAMAN LLP VERONICA M. GRAY (SBN 72572) vgray@nossaman.com ANDREW C. CRANE (SBN 285211) acrane@nossaman.com 18101 Von Karman Avenue, Suite 1800 Irvine, CA 92612 Telephone: 949.833.7800 Facsimile: 949.833.7878 S. ASHAR AHMED (SBN 256711) aahmed@nossaman.com	
8 9 10 11	50 California Street, 34th Floor San Francisco, CA 94111 Telephone: 415.398.3600 Facsimile: 415.398.2438 Attorneys for Plaintiffs and Counter-Defe	endants
12	ICE Consulting, Inc.; Uzair Sattar; and Derick Needham	
14 15 16 17 18 19 20 21 22 23 24 225 26 27		CT OF CALIFORNIA CO DIVISION Case No: 3:16-cv-04349-EMC STIPULATION BY ALL PARTIES EXTENDING TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT'S COUNTERCLAIMS AND [PROPOSED] ORDER [LOCAL RULE 6-2] Counterclaims Filed: Sept. 16, 2016 Counterclaims Served: Sept. 16, 2016 Initial Response Date: Oct. 11, 2016 New Date to Respond: Oct. 25, 2016 Trial: Not Set
28		Cose No. 2:16 ov 0/2/10 F

STIPULATION BY ALL PARTIES EXTENDING TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT'S COUNTERCLAIMS AND [PROPOSED] ORDER 26674193.v1

1	Pursuant to Federal Rule of Civil Procedure 12(a)(1) and Local Rule 6-2		
2	and 8-3, Plaintiffs ICE Consulting, Inc., Uzair Sattar, and Derick Needham		
3	(collectively, "Plaintiffs"), and Defendant Gavin Jensen ("Defendant")		
4	(collectively, the "Parties"), by and through their respective counsel, hereby enter		
5	into this Stipulation Extending Time For Plaintiffs to Respond to Defendant's		
6	Counterclaims. This Stipulation is based on the contents of this stipulation and the		
7	Declaration of Andrew C. Crane ("Crane Dec."), filed concurrently herewith.		
8	WHEREAS, on September 16, 2016, Defendant filed an Answer and		
9	Counterclaims to Plaintiffs' First Amended Complaint (Dkt. No. 62). Crane Dec.,		
10	$\P 2.$		
11	WHEREAS, at the September 15, 2016 Motion for Preliminary Injunction		
12	hearing, the Court ordered the Parties to commence settlement discussions		
13	forthwith. Crane Dec., ¶ 3.		
14	WHEREAS, the Parties are currently engaged in settlement discussions per		
15	the Court's instruction. Crane Dec., ¶ 3.		
16	WHEREAS, Plaintiffs' response to Defendant's Counterclaims is due on		
17	October 11, 2016. Crane Dec., ¶ 4.		
18	WHEREAS, the Parties wish to continue focusing exclusively on settlemen		
19	negotiations before incurring any additional expense. Crane Dec., ¶ 4.		
20	WHEREAS, there have been no previous time modifications in this case.		
21	Crane Dec., ¶ 5.		
22	WHEREAS, the Court has set the Case Management Conference in this		
23	matter for November 8, 2016. Crane Dec., ¶ 6.		
24	WHEREAS, the extension sought by this Stipulation will not affect the		
25	schedule for this case. Crane Dec., ¶ 6.		
26			
27	- 1 - Case No. 3:16-cv-04349-EMC		
28	STIPULATION BY ALL PARTIES EXTENDING TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT'S COUNTERCLAIMS AND [PROPOSED] ORDER		

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1	THEREFORE, THE PARTIES HEREBY STIPULATE:	
2	That Plaintiffs' deadline to respond to Defendant's Counterclaims shall be	
3	extended to October 25, 2016.	
4	IT IS SO STIPULATED.	
5		
6 7	Date: October 7, 2016 NOSSAMAN LLP VERONICA M. GRAY ANDREW C. CRANE	
8	By: /s/ Andrew C. Crane	
9	Andrew C. Crane	
10	Attorneys for Plaintiffs and Counter-	
11	Defendants ICE Consulting, Inc.; Uzair Sattar;	
12	and Derick Needham	
13	DHILLON LAW GROUP INC	
14	Date: October 7, 2016	
15	By: /s/ Nitoj P. Singh	
16	Nitoj P. Singh	
17	Attorneys for Defendant and Counter- Claimant	
18	Gavin Jensen	
19		
20	ORDER ATES DISTRICT	
21	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
22	IT IS SO ORDERED	
23	IT IS SO OTHE	
24	Judge Edward M. Chen	
25		
26	Taxed States District Judge	
27	-2 - DISTRICTOR 3:16-cv-04349-EMC	
28	STIPULATION BY ALL PARTIES EXTENDING TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT'S COUNTERCLAIMS AND [PROPOSED] ORDER	

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